

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

CIVIL ACTION NO. 3:23-CV-00667

JANE DOE

Plaintiff,

v.

FARD SULTAN

Defendant.

**JOINT MOTION FOR ENTRY OF
STIPULATED PERMANENT
INJUNCTION AND FINAL JUDGMENT**

Plaintiff Jane Doe (“Plaintiff”) and Defendant Fard Sultan (“Defendant”) hereby jointly and respectfully request that the Court enter a Stipulated Permanent Injunction and Final Judgment, in the form of the attached Exhibit A. In support of this joint motion, Plaintiff and Defendant jointly show the following:

1. Plaintiff filed the Complaint in this matter (ECF No. 1) on October 18, 2023. Along with the Complaint, Plaintiff filed a Motion for *Ex Parte* Temporary Restraining Order, Preliminary Injunction, and to Proceed Under a Pseudonym. (ECF No. 4.) Plaintiff also filed a supporting Declaration and brief. (ECF Nos. 5-6.)
2. On October 19, 2023, the Court entered a Temporary Restraining Order, granted Plaintiff’s motion to proceed under the pseudonym “Jane Doe,” and set a hearing on the Motion for Preliminary Injunction for October 25, 2023. (ECF No. 7.)
3. Following the hearing, on October 25, 2023, the Court entered a Preliminary Injunction. (ECF No. 11.)
4. Defendant filed an Answer on December 7, 2023. (ECF No. 12.)

5. The parties conducted a Rule 26(f) conference and submitted a proposed discovery plan on January 5, 2024. (ECF No. 14.) The Court entered a Case Management Order on January 10, 2024. (ECF No. 15.)

6. Plaintiff served initial disclosures, written discovery requests, and, on May 29, 2024, took Defendant's deposition.

7. At the conclusion of Defendant's deposition, the parties began discussing whether there might be a path to resolving this matter by agreement. The parties continued these discussions, which eventually resulted in a draft of a stipulated permanent injunction and final judgment. To facilitate an expeditious resolution of this matter, and to ensure that all intimate images are destroyed as quickly as possible, Plaintiff confirmed as part of these discussions that she is willing to forego any monetary recovery, as reflected in the attached Exhibit A.

8. Counsel for Plaintiff and Defendant spoke by telephone on Wednesday, July 24, 2024, during which they reviewed the Stipulated Permanent Injunction and Final Judgment line by line, reached agreement as to its content, and confirmed that it should be presented to the Court as a joint filing.

9. The parties negotiated and reached agreement on the Stipulated Permanent Injunction and Final Judgment with the goal of concluding this civil action in an efficient and fair manner. To confirm, the parties have agreed to resolve the case through entry of a permanent injunction and final judgment, conditioned upon the Court's approval of the parties' proposal, which is reflected in the attached Exhibit A. The parties believe that entry of the Stipulated Permanent Injunction and Final Judgment is in their respective best interests.

10. To any extent that this joint motion could be construed as generally requiring a supporting brief under the Local Civil Rules, the parties request that the Court waive that requirement in light of the circumstances presented herein.

11. Because Defendant is proceeding *pro se* and is not a registered ECF e-filer, this joint motion is submitted by the undersigned by agreement on behalf of both parties.

WHEREFORE, for the foregoing reasons, the parties jointly and respectfully request that the Court enter a Stipulated Permanent Injunction and Final Judgment, in the form of the attached Exhibit A, to resolve all matters in dispute in this case.

This the 1st day of August, 2024.

/s/ L. Cooper Harrell

L. Cooper Harrell
N.C. State Bar No. 27875
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Pro se Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document has been served by first class mail as follows:

Fard Sultan
801 S. Main Street, Apt. #220
Mount Holly, NC 28210

This the 1st day of August, 2024.

/s/ L. Cooper Harrell
L. Cooper Harrell